

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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**BERNADINE T. GRIFFITH**

**Plaintiff,**

**v.**

**ONEBEACON INSURANCE COMPANY,  
ONEBEACON AMERICA INSURANCE  
COMPANY, MICHAEL A. SISTO, and  
KAREN ALLEN HOLMES**

**Defendants.**

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**C.A. No. 03-CV-12573-EFH**

**JOINT MOTION TO EXTEND DISCOVERY PERIOD  
AND AMEND SCHEDULING ORDER**

Now come the parties and respectfully request a three (3) month extension of the discovery period and the amendment of the scheduling order issued in the above-captioned matter. Specifically, and for the reasons set forth below, the parties request extensions of the following deadlines:

<u>Event</u>	<u>Requested Deadline</u>
Fact discovery complete	March 1, 2005
Plaintiff to disclose expert witnesses	April 15, 2005
Defendants to disclose expert witnesses	May 28, 2005
Depositions of all experts complete	June 28, 2005
All motions for amendments to pleadings filed	March 6, 2005

<u>Event</u>	<u>Requested Deadline</u>
Motions under FRCP 56 filed	April 31, 2005
Oppositions to motions under FRCP 56 filed	May 21, 2005
Final pre-trial conference held and firm trial date set	August 2005

As grounds for their motion, the parties state as follows:

1. The parties are currently engaged in the discovery process. Though four depositions have been taken, the parties anticipate the need for several more including that of one of the named Defendants who currently resides in New Jersey. Because the matter is factually complex and involves events that began over eight (8) years ago, fact discovery has been both tedious and time consuming.

2. Though the parties have completed some discovery, this process was delayed by the multiple procedural arguments including the amending of the Complaint in the instant matter. In sum, the parties spent the four months of the discovery period engaged in preliminary matters that needed to be resolved before substantive discovery could begin. Accordingly, it will be nearly impossible to complete discovery before the December 1, 2004 deadline contained in the present scheduling order.

WHEREFORE, for the foregoing reasons, the parties respectfully request that this Court extend the discovery deadline and amend the Scheduling Order as set forth above.

Respectfully submitted,

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Dated: November 19, 2004